

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

PROMEGA CORPORATION,

Plaintiff,

MAX-PLANCK-GESELLSCHAFT ZUR
FORDERUNG DER WISSENSCHAFTEN
E.V.,

Case No.: 10-CV-281

Involuntary Plaintiff,

v.

LIFE TECHNOLOGIES CORPORATION,
INVITROGEN IP HOLDINGS, INC., and
APPLIED BIOSYSTEMS, INC.,

Defendants.

PROMEGA CORPORATION'S MOTION FOR CLAIMS CONSTRUCTION

NOW COMES the Plaintiff, Promega Corporation, and respectfully moves for appropriate construction of certain patent claims in this matter. The basis for this Motion is set forth in Promega Corporation's Opening Claims Construction Brief filed herewith, and the Declaration of Randall L. Dimond Ph.D. in support of Promega Corporation's Opening Claims Construction Brief, incorporated here by reference, and such other documents, pleadings and matters of record in these proceedings.

Respectfully submitted this 30th day of March, 2011.

TROUPIS LAW OFFICE, LLC

By: /s/ James R. Troupis

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